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Attorneys for Respondents/Cross-Petitioners

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

Matt Allen and 3,552 Other Individuals,

Petitioners,

vs.

BAMTECH, LLC; DISNEY
PLATFORM DISTRIBUTION, INC.
(d/b/a Disney Streaming Services,
LLC); ESPN, INC.; and THE WALT
DISNEY COMPANY,

Respondents/Cross-
Petitioners BAMTech
LLC, Disney Platform
Distribution, Inc.

Case No. 2:25-cv-03861-MWC-KS

**JOINT NOTICE OF SETTLEMENT
IN PRINCIPLE AND JOINT
MOTION FOR STAY**

Judge: Hon. Michelle Williams Court

Am. Petition Filed: July 1, 2025

Am. Motion Filed: July 1, 2025

Cross-Petition Filed: August 22, 2025

Current Hearing Date: None

Filed concurrently: [Proposed] Order

1 Petitioners Matt Allen and 3,552 Other Individuals (“Petitioners”),
2 Respondents ESPN, Inc., and The Walt Disney Company, and Respondents/Cross-
3 Petitioners BAMTech, LLC and Disney Platform Distribution, Inc.
4 (“Respondents”), by and through their counsel of record, hereby notify the Court
5 that the parties have reached a settlement in principle to resolve this matter, and
6 respectfully request that this action, including any decision on the pending cross-
7 petitions to compel arbitration, be stayed pending finalization of the settlement.

8 The parties stipulate and agree as follows:

9 WHEREAS, Petitioners filed the operative Amended Petition and Amended
10 Motion (“Amended Petition”) on July 1, 2025;

11 WHEREAS, Respondents filed a Cross-Petition and Opposition to
12 Petitioners’ Amended Petition on August 22, 2025;

13 WHEREAS, Petitioners filed a Reply in Support of the Amended Petition and
14 Opposition to the Cross-Petition on September 19, 2025;

15 WHEREAS, Respondents filed a Reply in Support of the Cross-Petition on
16 October 10, 2025;

17 WHEREAS, the parties have reached a settlement in principle to resolve this
18 matter;

19 WHEREAS, the parties have agreed to make good-faith efforts to finalize the
20 settlement agreement by October 31, 2025;

21 WHEREAS, the parties have agreed the settlement shall be effective upon the
22 performance of certain obligations over a 120-day period following execution of the
23 settlement agreement;

24 WHEREAS, good cause therefore exists to stay this action, including any
25 decision on the pending cross-petitions to compel arbitration, while the parties
26 finalize the settlement agreement and until the settlement is effective;

27 **NOW, THEREFORE, THE PARTIES HEREBY STIPULATE**, and
28 respectfully request that the Court enter an Order providing, that:

- This action is stayed; and
- The parties shall file a joint stipulation of dismissal or otherwise update the Court once the settlement has become effective and no later than March 6, 2026.

Respectfully submitted,

DATED: October 22, 2025

MUNGER, TOLLES & OLSON LLP

By: /s/ Jonathan H. Blavin

JONATHAN H. BLAVIN

Attorneys for Respondents/Cross-Petitioners

DATED: October 22, 2025

LABATON KELLER SUCHAROW LLP

By: /s/ Jonathan Waisnor

JONATHAN WAISNOR

Attorney for Petitioners

Pursuant to Civil L.R. 5-4.3.4(a)(2)(i), I certify that all signatories listed, and on whose behalf this filing is submitted, concur in the filing's content and have authorized its filing.

By: /s/ Jonathan H. Blavin

JONATHAN H. BLAVIN

Attorneys for Respondents/Cross-Petitioners